REMARKS/ARGUMENTS

Claims 1-27 are pending. Claims 1, 10, and 19 are amended herein. No new matter is added as a result of the Claim amendments. Please cancel Claims 2, 11, and 19 without prejudice.

35 U.S.C. § 102 Rejections

Claims 1-5, 10-14, and 19-23 are rejected under 35 U.S.C. § 102 (e) as being anticipated by Arkko et al., (U.S. Patent 6,535,517), hereinafter referred to as "Arkko." The Applicants respectfully submit that Arkko does not teach or suggest the claim limitations recited in Claims 1, 10, and 19 of the present invention. For example, Claim 1 of the present invention recites (emphasis added):

> A method for managing a network infrastructure comprising:
> storing an expected network infrastructure description, and wherein said expected network infrastructure description comprises an expected physical topography and an expected logical topography;
> comparing said expected network infrastructure description with a current network infrastructure description, and wherein said current network infrastructure description comprises a current physical topography and a current logical topography; and
> outputting a result of said comparing, wherein differences between said expected network infrastructure description and said current network infrastructure description are displayed.

Claims 10 and 19 recite similar claim limitations. The Applicants respectfully submit that Arkko does not teach or suggest the storing or comparing of an expected network infrastructure comprising an expected physical topography and an expected logical topography as recited in Claims 1, 10, and 19 of the present invention. Furthermore, Arkko does not teach or suggest comparing the expected network infrastructure description with a current network infrastructure

description comprising a current physical topography and a current logical topography as recited in Claims 1, 10, and 19 of the present invention.

In contrast to Arkko, the switched network infrastructure descriptions recited in Claims 1, 10, and 19 of the present invention comprise physical topologies, logical topologies, as well as configuration information of individual computer systems of the network. Thus, the Applicants respectfully submit that Burgess does not teach or suggest physical and logical topology configuration information as recited in Claims 1, 10, and 19 of the present invention. Accordingly, the Applicants respectfully submit that the rejection of Claims 1, 10, and 19 under 35 U.S.C. § 102 (e) are overcome.

Claims 2-5 depend from Claim 1 and recite additional limitations descriptive of embodiments of the present invention. Accordingly, the Applicants respectfully submit that the rejection of Claims 2-5 under 35 U.S.C. § 102 (e) are also overcome.

Claims 11-14 depend from Claim 10 and recite additional limitations descriptive of embodiments of the present invention. Accordingly, the Applicants respectfully submit that the rejection of Claims 11-14 under 35 U.S.C. § 102 (e) are also overcome.

Claims 19-23 depend from Claim 19 and recite additional limitations descriptive of embodiments of the present invention. Accordingly, the Applicants respectfully submit that the rejection of Claims 19-23 under 35 U.S.C. § 102 (e) are also overcome.

35 U.S.C. § 103 Rejections

Claims 6, 15, and 24 are rejected under 35 U.S.C. § 103 (a) as being obvious over Arkko in view of Miyake et al., (U.S. Pub. No. 2001/0042118 A1), hereinafter referred to as "Miyake." The Applicants respectfully submit that the embodiments of the present invention recited in Claims 6, 15, and 24 are not rendered obvious by Arkko alone, or in combination with Miyake. For example, the Applicants respectfully submit that Arkko does not teach or suggest a graphical description of either the expected network infrastructure, or the current network infrastructure as recited in Claims 6, 15, and 24 of the present invention. Furthermore, as discussed above, the Applicants respectfully assert that Arkko does not teach or suggest storing or comparing an expected physical topography and an expected logical topography with a corresponding current physical topography and current logical topography as recited in Claims 1, 10, and 18 of the present invention.

The Applicants respectfully submit that Miyake fails to overcome the shortcomings of Arkko. More specifically, the Applicants respectfully assert that Miyake does not teach or suggest comparing an expected physical topography and an expected logical topography with a current physical topography and current logical topography as recited in Claims 1, 10, and 18 of the present invention. Thus, a combination of Arkko and Miyake is not capable of comparing resources which they do not monitor. More specifically, a combination of Arkko and Miyake would not be capable of comparing an expected physical topography and an expected logical topography with a current physical topography and current logical topography as recited in Claims 1, 10, and 18 of the present invention. As a result, the Applicants respectfully submit that Arkko alone, or in combination with Miyake, does not teach the further limitation recited in Claims 6, 15, and 24 of the present invention of converting said expected network infrastructure description into an expected network infrastructure graphical description and converting said current network infrastructure description into a current network infrastructure graphical description.

Additionally, the Applicants respectfully submit that the determination of obviousness cannot be based on the hindsight combination of components selectively culled from the prior art to fit the parameters of the present invention. There must be teaching or suggestion within the prior art to select the particular elements, and to combine them in the way they were combined by the inventors. The Applicants respectfully submit that neither Arkko nor Miyake teach or suggest a combination as cited in the rejection of Claims 6, 15, and 24. Accordingly, the Applicants respectfully submit that Claims 6, 15, and 24 overcome the rejection under 35 U.S.C. § 103 (a).

Claims 7, 16, and 25 are rejected under 35 U.S.C. § 103 (a) as being obvious over Arkko in view of Miyake and in further view of Benfield et al., (U.S. Publication No. U.S. 2003/0009552 A1), hereinafter referred to as "Benfield." As described above, neither Arkko nor Miyake teach or suggest comparing an expected physical topography and an expected logical topography with a current physical topography and current logical topography as recited in Claims 1, 10, and 18 of the present invention. The Applicants respectfully submit that Benfield fails to overcome the shortcomings of Arkko and Miyake. More specifically, Benfield does not teach or suggest comparing an expected physical topography and an expected logical topography with a current physical topography and current logical topography as recited in Claims 1, 10, and 18 of the present invention.

The Applicants again submit that the determination of obviousness cannot be based on the hindsight combination of components selectively culled from the prior art to fit the parameters of the present invention. There must be teaching or suggestion within the prior art to select the particular elements, and to combine them in the way they were combined by the inventors. The Applicants respectfully submit that neither Arkko, Miyake, nor Benfield teach or suggest a combination as cited in the rejection of Claims 7, 16, and 25. Accordingly, the Applicants respectfully submit that Claims 7, 16, and 25 overcome the rejection under 35 U.S.C. § 103 (a).

Claims 8, 17, and 26 are rejected under 35 U.S.C. § 103 (a) as being obvious over Arkko in view of Miyake and in further view of Fitzgerald et al., (U.S. Patent. No. 5,581,764), hereinafter referred to as "Fitzgerald." As described above, neither Arkko, Miyake, nor Benfield teach or suggest comparing an expected physical topography and an expected logical topography with a current physical topography and current logical topography as recited in Claims 1, 10, and 18 of the present invention. The Applicants respectfully submit that Fitzgerald fails to overcome the shortcomings of Arkko, Miyake, and Benfield. More specifically, Fitzgerald does not teach or suggest comparing an expected physical topography and an expected logical topography with a current physical topography and current logical topography as recited in Claims 1, 10, and 18 of the present invention.

The Applicants again submit that the determination of obviousness cannot be based on the hindsight combination of components selectively culled from the prior art to fit the parameters of the present invention. There must be teaching or suggestion within the prior art to select the particular elements, and to combine them in the way they were combined by the inventors. The Applicants respectfully submit that neither Arkko, Miyake, Benfield, nor Fitzgerald teach or suggest a combination as cited in the rejection of Claims 7, 16, and 25. Accordingly, the Applicants respectfully submit that Claims 7, 16, and 25 overcome the rejection under 35 U.S.C. § 103 (a).

CONCLUSION

In light of the above remarks, the Applicants respectfully request reconsideration of the rejected Claims.
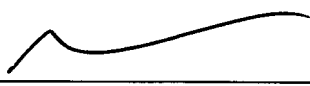
Based on the arguments presented above, the Applicants respectfully assert that Claims 1-27 overcome the rejections of record and, therefore, the Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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